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Attorneys for Plaintiff (*continued on next page*)

**UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA**

JENNIFER ATKINSON,

Plaintiff,

v.

AECOM, AECOM MANAGEMENT
 SERVICES, Inc.; THOMAS B. MODLY,
 Acting Secretary of the U.S. Navy; PAE
 AVIATION AND TECHNICAL
 SERVICES LLC;

Defendants.

Case No. 5:18-cv-02617-JGB(KKx)

**REQUEST FOR DISMISSAL WITH
 PREJUDICE OF DEFENDANTS
 AECOM AND AECOM
 MANAGEMENT SERVICES, INC.
 FROM THE ACTION**

Complaint filed: December 18, 2018
 FAC filed: February 15, 2019
 SAC filed: April 4, 2019
 TAC filed: May 22, 2019
 Trial: January 12, 2021

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Attorneys for Plaintiff

6 JENNIFER ATKINSON

1 TO THE HONORABLE COURT AND TO ALL INTERESTED PARTIES:

2 On March 13, 2020, Plaintiff JENNIFER ATKINSON (“Plaintiff”) and Defendants
3 AECOM, AECOM MANAGEMENT SERVICES, Inc., THOMAS B. MODLY, Acting
4 Secretary of the U.S. Navy (“U.S. Navy”), and PAE AVIATION AND TECHNICAL
5 SERVICES LLC (“PAE”) filed a Joint Settlement Report and Notice of Partial
6 Settlement, (ECF No. 74), stating that Plaintiff had reached a negotiated resolution of all
7 claims pending against Defendants AECOM, Inc. and AECOM MANAGEMENT
8 SERVICES, Inc.¹ (“AECOM Defendants”).

9 Pursuant to Federal Rule of Civil Procedure 41, Plaintiff JENNIFER ATKINSON
10 (“Plaintiff”) hereby requests that the Court dismiss the AECOM Defendants from the
11 above-captioned action in its entirety with prejudice.

12 Plaintiff has not reached a resolution with either Defendant U.S. Navy or
13 Defendant PAE, and Plaintiff continues to pursue her claims pending against these two
14 defendants under the causes of action, theories and facts as alleged by Plaintiff in the
15 Third Amended Complaint.

16 The AECOM Defendants’ settlement payment to Plaintiff constitutes the entire,
17 maximum amount the AECOM Defendants will be required to pay Plaintiff in connection
18 with the Action, given the Ninth Circuit’s bar on further contribution from settling
19 parties. *See Franklin v. Kaypro Corp.*, 884 F.2d 1222, 1231 (9th Cir. 1989).

20
21 Respectfully submitted,

22 Date: July 23, 2020

23 ACLU FOUNDATION OF SOUTHERN CALIFORNIA
24 Amanda Goad
25 Aditi Fruitwala
26 Ariana Rodriguez

27 ACLU FOUNDATION OF NORTHERN CALIFORNIA
28 Elizabeth Gill
Aditi Fruitwala

¹ AECOM Management Services, Inc. changed its name and now operates as Amentum Services, Inc.

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s/Amelia Alvarez
Amelia Alvarez
J. Bernard Alexander
Attorneys for Plaintiff
JENNIFER ATKINSON

4810-5285-7540, v. 1

CERTIFICATE OF SERVICE

I, Amelia Alvarez, an employee in the City of Los Angeles, certify that on July 23, 2020, caused a true and correct copies of the foregoing be filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following counsel who has registered for receipt of documents filed in this matter:

1. **REQUEST FOR DISMISSAL (AECOM);**
2. **[PROPOSED] ORDER RE REQUEST FOR DISMISSAL (AECOM)**

[SEE SERVICE LIST]

July 23, 2020

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